

GOODSILL ANDERSON QUINN & STIFEL
A LIMITED LIABILITY LAW PARTNERSHIP LLP

ROY J. TJIOE 4861-0

rtjioe@goodsill.com
Alii Place, Suite 1800
1099 Alakea Street
Honolulu, Hawaii 96813
Telephone: (808) 547-5600
Facsimile: (808) 547-5880

Attorney for Defendant
SULLIVAN PROPERTIES, INC.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

SCOTTSDALE INSURANCE
COMPANY,

Plaintiff,

vs.

SULLIVAN PROPERTIES, INC.;
ROBERT B. SULLIVAN; MAUI
LAND & PINEAPPLE COMPANY,
INC.; AND KAPALUA LAND
COMPANY, LTD.,

Defendants.

CIVIL NO. CV04-00550 HG BMK
(Declaratory Relief)

**DEFENDANT SULLIVAN
PROPERTIES, INC.'S JOINDER
IN DEFENDANT ROBERT B.
SULLIVAN'S MEMORANDUM
IN OPPOSITION TO PLAINTIFF
SCOTTSDALE INSURANCE
COMPANY'S MOTION FOR
PARTIAL SUMMARY
JUDGMENT RE:
REIMBURSEMENT OF CLAIM,
FILED DECEMBER 1, 2006 (filed
01/04/07); CERTIFICATE OF
SERVICE**

*Hearing: January 22, 2007
Time: 9:30 a.m.
Judge: Hon. Helen Gillmor*

DEFENDANT SULLIVAN PROPERTIES, INC.'S
JOINDER IN DEFENDANT ROBERT B. SULLIVAN'S
MEMORANDUM IN OPPOSITION TO PLAINTIFF
SCOTTSDALE INSURANCE COMPANY'S MOTION FOR
PARTIAL SUMMARY JUDGMENT RE: REIMBURSEMENT
OF CLAIM, FILED DECEMBER 1, 2006 (filed 01/04/07)

Defendant SULLIVAN PROPERTIES, INC. ("SPI"), by and through its attorneys, Goodwill Anderson Quinn & Stifel, A Limited Liability Law Partnership LLP, pursuant to LR 7.2, 7.4, 7.9 and 56.1 of the Local Rules of Practice for the United States District Court for the District of Hawaii, hereby joins in Defendant Robert B. Sullivan's Memorandum in Opposition to Plaintiff Scottsdale Insurance Company's Motion for Partial Summary Judgment Re: Reimbursement Claim, filed December 1, 2006, filed herein on January 4, 2007.

DATED: Honolulu, Hawaii, January 5, 2007.

/s/ Roy J. Tjioe

ROY J. TJIOE
Attorney for Defendant
SULLIVAN PROPERTIES, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

SCOTTSDALE INSURANCE
COMPANY,

Plaintiff,

vs.

SULLIVAN PROPERTIES, INC.;
ROBERT B. SULLIVAN; MAUI
LAND & PINEAPPLE COMPANY,
INC.; AND KAPALUA LAND
COMPANY, LTD.,

Defendants.

CIVIL NO. CV04-00550 HG BMK
(Declaratory Relief)

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing
document was duly served upon the following parties, in the manner described
thereto, at their last-known addresses on the date indicated below:

HAND
DELIVERED MAILED FAXED ECF

SIDNEY K. AYABE,
 sidney.ayabe@hawadocate.com

JEFFREY H. K. SIA
 jeffrey.sia@hawadocate.com
 Pauahi Tower, Suite 2500
 1001 Bishop Street
 Honolulu, HI 96813

ALAN B. YUTER
 RACHEL E. HOBBS
 THOMAS A. BURGOS, III
 Selman Breitman LLP
 11766 Wilshire Boulevard, 6th Floor
 Los Angeles, CA 90025-6538

Attorneys for Plaintiff
**SCOTTSDALE INSURANCE
 COMPANY**

MICHELE-LYNN E. LUKE
 michele@richardsandluke.com
 Pauahi Tower, Suite 2700
 1001 Bishop Street
 Honolulu, HI 96813

Attorney for Defendant
ROBERT B. SULLIVAN

HAND
DELIVERED MAILED FAXED ECF

COLIN O. MIWA cmiwa@ades.com	[]	[]	[]	[X]
MARTIN E. HSIA Cades Schutte LLP Suite 1200, 1000 Bishop Street Honolulu, HI 96813	[]	[X]	[]	[]

Attorney for Defendants
**MAUI LAND & PINEAPPLE
COMPANY, INC. and KAPALUA
LAND COMPANY, LTD.**

DATED: Honolulu, Hawaii, January 5, 2007.

/s/ Roy J. Tjioe

ROY J. TJIOE
Attorney for Defendant
SULLIVAN PROPERTIES, INC.